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*Attorneys for Defendant  
Carrier iQ, Inc.*

*[Additional signatures below]*

17 UNITED STATES DISTRICT COURT  
18  
19 NORTHERN DISTRICT OF CALIFORNIA  
20  
21 SAN FRANCISCO DIVISION  
22  
23

24 *In re Carrier IQ, Inc. Consumer Privacy*  
25 *Litigation*

26 [This Document Relates to All Cases]  
27  
28

Case No. C-12-md-2330-EMC

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO FILE  
SETTLEMENT AGREEMENT AND  
CONTINUING PRELIMINARY  
APPROVAL HEARING DATE**

STIPULATION EXTENDING TIME TO FILE  
MOTION FOR PRELIMINARY APPROVAL

Case No. C-12-md-2330-EMC

1 This Stipulation and [Proposed] Order is entered into between Plaintiffs' Interim Co-Lead  
 2 Counsel ("Plaintiffs") and counsel for defendants Carrier IQ, Inc., HTC America, Inc., HTC  
 3 Corporation, Huawei Devices USA, Inc., LG Electronics MobileComm U.S.A, Inc., LG  
 4 Electronics, Inc., Motorola Mobility LLC, Pantech Wireless, Inc., Samsung Electronics America,  
 5 Inc., and Samsung Electronics Co., Ltd ("Defendants").

6 WHEREAS, the current deadline for Plaintiffs to file a motion for preliminary settlement  
 7 approval is January 15, 2016;

8 WHEREAS, a hearing on Plaintiffs' anticipated motion for preliminary settlement  
 9 approval is currently on calendar for January 28, 2016;

10 WHEREAS, the parties have reached agreement on all terms and language of a settlement  
 11 agreement, but have not yet been able to obtain signatures from each party or an appropriate  
 12 representative of each party;

13 WHEREAS, the parties anticipate that by January 22, 2016, each party will be able to  
 14 obtain the necessary signatures;

15 WHEREAS, continuing the hearing on Plaintiffs' motion for preliminary settlement  
 16 approval will allow the court adequate time to review the motion and settlement agreement in  
 17 light of later filing date;

18 WHEREAS, February 16, 2016 at 2:00 p.m. is currently available for a hearing on the  
 19 Court's calendar;

20 NOW, THEREFORE, Plaintiffs and Defendants, by and through their respective counsel  
 21 of record, hereby stipulate, subject to Court approval, as follow:

22 Plaintiffs' motion for preliminary settlement approval shall be filed on or before January  
 23 22, 2016. The hearing on Plaintiffs' anticipated motion is continued to February 16, 2016 at 2:00  
 24 p.m.

25 Dated: January 15, 2016

By: /s/ Robert F. Lopez

Steve W. Berman

Robert F. Lopez

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28 STIPULATION EXTENDING TIME TO FILE  
 MOTION FOR PRELIMINARY APPROVAL

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*Attorneys for Defendant Motorola Mobility LLC*

**[PROPOSED] ORDER**

Pursuant to Stipulation, it is SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Honorable Edward M. Chen  
United States District Judge

**ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

I, Tyler G. Newby, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE SETTLEMENT AGREEMENT AND CONTINUING PRELIMINARY APPROVAL HEARING DATE**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: January 15, 2016

/s/ Tyler G. Newby

Tyler G. Newby

**CERTIFICATE OF SERVICE**

I hereby certify that on January 15, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have caused to be mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

Dated: January 15, 2016

/s/ Tyler G. Newby

Tyler G. Newby